

**BEFORE THE UNITED STATES
FEDERAL ENERGY REGULATORY COMMISSION**

Tennessee Gas Pipeline, LLC)	
A division of Kinder Morgan)	Docket No. CP16-21-000
Northeast Energy Direct Pipeline)	

**MOTION TO INTERVENE OF THE TOWN OF NORTHFIELD
IN REFERENCE TO THE NORTHEAST ENERGY DIRECT (NED) PIPELINE**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's (Commission) Rules of Practice and Procedure, 18 C.F.R. §385.214, The Town of Northfield (hereinafter referred to as "the Town") files this Motion to Intervene in the above-captioned proceeding. The Town has significant concerns regarding the environmental, safety, and socioeconomic impacts of the NED pipeline project. The resources in the Town that could be directly impacted by the proposed pipeline include: public and private drinking water supplies, permanently protected open space, farmland, rare and endangered species habitats, wetlands, vernal pools, cold-water fisheries, public infrastructure, private homes and businesses, and historic resources. The short and long-term impacts that the proposed project could have in our community are profound. The Town seeks to intervene on the NED Project to monitor the progress of the proceedings and expects to take a position on the Project once we complete our review of the application filed with FERC.

I. STATEMENT OF INTEREST

A. Description of the Town of Northfield

The Town of Northfield is a small, rural community in Franklin County, Massachusetts consisting of 3,023 residents. If this project is approved the Town will play host to approximately 8.5 miles of pipeline and a 41,000 hp compressor station. The proposed project will directly impact 31 property owners and more than 100 property owners within 0.5 miles of the pipeline.

The proposed pipeline would be located in areas of the Town zoned for residential, agriculture, and forestry and is largely comprised of farmland and forest with sensitive habitat areas and other natural resources.

B. Description of Impacts

The Town of Northfield will be directly impacted and harmed by the proposed project as follows. The proposed pipeline will run through 8.5 miles through the geographic center of the Town. It will cross conservation lands, state forest lands protected by the Massachusetts State Constitution (Article 97), sensitive water protection areas, permanently protected open space, farmland, forestland, rare, threatened and endangered species habitats, wetlands, vernal pools, cold-water fisheries, public infrastructure, private homes and business, and historic resources.

The economic and public health of rural residents is closely tied to the health and viability of the region's natural resource base. Further, the NED pipeline project is proposed to be sited in an Environmental Justice Area in the northern portion of Northfield, and through a National Scenic Trail, which brings tourists to Northfield.

The pipeline is expected to impact air and water quality and may generate noise pollution. The pipeline also has the potential to impact private property including private wells and septic systems within the Town.

Fire protection is provided by an all-volunteer fire department, with forest fire support from then State. While a portion of Northfield is served by hydrants, the areas proposed by the NED plans are not. Most of the roads cited by Tennessee Gas are rural two-lane, in some cases unpaved, and with small bridges which are not suitable for heavy construction equipment or increased traffic.

C. Standard for Intervention

The Town of Northfield's Motion to Intervene must be granted to the Town of Northfield as it satisfies the standard for intervention under FERC's regulations. As discussed above, Northfield is directly impacted by the proposed project, and no other individual or organization can adequately represent Northfield's unique interest in this proceeding. Further, Northfield's intervention is in the public interest because the Town is responsible for the protection of the health and safety of all of its residents. Accordingly, the Town of Northfield respectfully requests that FERC grant this Motion to Intervene.

II. CONTACT INFORMATION

The following should be added to the Official Service List, with all notice and communications in this proceeding addressed to the contacts listed below:

Mr. Brian S. Noble, Town Administrator
Town of Northfield, 69 Main Street, Northfield, MA 01360

III. CONCLUSION

Wherefore, in light of the foregoing, the Town of Northfield respectfully requests that the Commission GRANT this Motion to Intervene and allow the INTERVENOR to participate in this proceeding with full rights of party status, including the right to request a hearing, cross examine witnesses and seek rehearing and appeal.

Submitted by request of the Board of Selectmen,



Brian S. Noble, Town Administrator
Town of Northfield, Massachusetts

CERTIFICATE OF SERVICE

Wherefore on this December 15, 2015, I caused to be served the foregoing Motion to Intervene electronically on all parties on the Commission's electronic service list in this proceeding, in accordance with Commission regulations.

A handwritten signature in blue ink, reading "Brian L. Noble", is positioned above a horizontal line.